

Mary C. Geddes  
Assistant Federal Defender  
FEDERAL PUBLIC DEFENDER  
FOR THE DISTRICT OF ALASKA  
601 West Fifth Avenue, Suite 800  
Anchorage, Alaska 99501  
(907) 646-3400

Attorney for Petitioner

UNITED STATES DISTRICT COURT  
  
FOR THE DISTRICT OF ALASKA

JACK L. EARL, JR.,

Petitioner,

vs.

CRAIG TURNBULL,

Respondent.

Case No. 3:02-cv-0224-HRH

**UNOPPOSED MOTION TO EXTEND  
TIME FOR BRIEFING**  
*Filed on Shortened Time*

Petitioner, Jack L. Earl, Jr., by and through counsel Mary C. Geddes, Assistant Federal Defender, moves to extend the time set for the submission of his opening brief. The brief was due today. This motion is unopposed by Kenneth Rosenstein, attorney for the respondent. Mr. Earl seeks an additional six weeks, as the undersigned counsel will be out on personal and administrative leave for approximately two weeks of that time. This extension of time is made necessary because of the volume of records involved. Mr. Earl had a lengthy evidentiary hearing and two trials. However, habeas counsel has also faced considerable difficulty in locating some

of the state court records for her review. Although she has spent much of the last three weeks in her part-time schedule on Mr. Earl's case, she has been as yet unable to finalize her preparation of a record which will suffice to document Mr. Earl's claims without unreasonably burdening the adjudicative process

Having spoken with Kenneth Rosenstein and Mr. Earl about this request, and their lack of disagreement with it, a further extension of six weeks is hereby requested.

DATED this 28th day of December, 2006.

Respectfully submitted,

FEDERAL PUBLIC DEFENDER  
FOR THE DISTRICT OF ALASKA

/s/ Mary C. Geddes  
Assistant Federal Defender  
Alaska Bar No. 8511157  
601 West 5<sup>th</sup> Avenue, Suite 800  
Anchorage, AK 99501  
Ph: (907) 646-3400  
Fax: (907) 646-3480  
mary\_geddes@fd.org

Certification:

I certify that on December 28, 2006, a copy of the foregoing document, with attachments, was served electronically on:

Kenneth M. Rosenstein, Esq.

/s/ Mary C. Geddes